

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|-------------------------------|---|--------------------------------|
| IWONA PORTALATIN, |) | |
| |) | |
| Plaintiff, |) | Case No.14-cv-8271 |
| |) | |
| v. |) | Honorable: Matthew F. Kennelly |
| |) | |
| MIDLAND FUNDING, LLC, et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |

UNOPPOSED MOTION TO EXTEND BRIEFING SCHEDULE

Defendant MIDLAND FUNDING, LLC ("Midland"), by and through its attorneys, David M. Schultz and Katherine H. Tresley with Hinshaw & Culbertson LLP, states the following for its Unopposed Motion to Extend Briefing Schedule on Midland's Motion for Summary Judgment and Plaintiff Iwona Portalatin's ("Plaintiff") Motion for Summary Judgment as to Midland:

1. On June 8, 2015, this Court entered a briefing schedule on the parties' Motions for Summary Judgment (Dkt. # 44.) Pursuant to that Order, dispositive motions are due up through and including July 6, 2015, and responses thereto are due up through and including July 27, 2015.

2. Plaintiff and Midland currently are engaged in settlement negotiations. Midland made a settlement offer on June 24, 2015. Plaintiff's counsel indicated that a response to said offer is forthcoming.

3. Plaintiff's counsel does not oppose this motion.

4. In light of the foregoing, Midland requests that the briefing schedule on Midland's Motion for Summary Judgment and Plaintiff's Motion for Summary Judgment as to Midland be extended by 21 days. This extension would put dispositive motions for Midland and Plaintiff (as to Midland) due up through and including July 27, 2015 and responses due up through and including August 17, 2015.

5. Midland and Plaintiff are hopeful that this additional time will permit them to reach a resolution without incurring the great time and expense associated with preparing dispositive motions.

WHEREFORE, Defendant Midland Funding, LLC, respectfully requests that this Court extend the briefing schedule on Plaintiff's Motion for Summary Judgment as to Midland and Midland's Motion for Summary Judgment.

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Respectfully submitted,

By: s/ Katherine H. Tresley
One of the Attorneys for Defendant

CERTIFICATE OF SERVICE

I, Katherine H. Tresley, an attorney, certify that I shall cause to be served a copy of the **UNOPPOSED MOTION TO EXTEND BRIEFING SCHEDULE** upon the following individual(s), by deposit in the U.S. mail box at 222 North LaSalle Street, Chicago, Illinois 60601, postage prepaid, messenger delivery, Federal Express, facsimile transmitted from (312) 704-3001, or electronically via the Case Management/Electronic Case Filing System ("ECF") as indicated, this 30th day of June 2015.

- ☒ CM/ECF
- ☐ Facsimile
- ☐ Federal Express
- ☐ Mail
- ☐ Messenger

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s/ Katherine H. Tresley
One of the Attorneys for Defendant